

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA

v.

TONI PATRICIA JOHNSON

INDICTMENT

Case No. _____

Violations: 21 U.S.C. §§ 841(a)(1),
841(b)(1)(C), and 846; and 18 U.S.C. § 2

COUNT ONE

Conspiracy to Distribute and Possess with Intent to Distribute Oxycodone

The Grand Jury Charges:

From in or about 2016 until in or about 2019, in the District of North Dakota, and elsewhere,

TONI PATRICIA JOHNSON

knowingly and intentionally combined, conspired, confederated, and agreed with others, both known and unknown to the grand jury, to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

Overt Acts

In furtherance of this conspiracy and to effect and accomplish the objects of it, one or more of the conspirators committed the following overt acts:

1. It was a part of said conspiracy that the defendant and others would and did distribute, and possess with intent to distribute, pills containing a detectable amount of oxycodone, a Schedule II controlled substance;
2. It was further a part of said conspiracy that the defendant and others would and did attempt to conceal their activities;
3. It was further a part of said conspiracy that the defendant and others would and did use United States currency in their drug transactions;
4. It was further a part of said conspiracy that the defendant and others would and did use telecommunication facilities, including cellular telephones, to facilitate the distribution of controlled substances;
5. It was further a part of said conspiracy that the defendant utilized, and allowed others to utilize, motor vehicles to transport individuals who possessed pills containing a detectable amount of oxycodone;
6. It was further a part of said conspiracy that one or more of the conspirators traveled by train, airline, automobile, and other means of transportation between, and within, Michigan and North Dakota, and elsewhere, to obtain and distribute pills containing oxycodone, and to transport the proceeds of distribution activity; and

7. It was further a part of said conspiracy that the defendant collected money from other persons to purchase pills containing oxycodone.

In violation of Title 21, United States Code, Section 846; Pinkerton v. United States, 328 U.S. 640 (1946).

COUNT TWO

Distribution of Oxycodone

The Grand Jury Further Charges:

Beginning in or about 2016 and continuing until in or about 2019, in the District of North Dakota, and elsewhere,

TONI PATRICIA JOHNSON,

individually, and by aiding and abetting, knowingly and intentionally distributed a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL:

/s/ Grand Jury Foreperson
Foreperson

/s/ Drew H. Wrigley
DREW H. WRIGLEY
United States Attorney

RLV/tmg